

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GEORGE GATLIN,)	
)	
Plaintiff,)	No. 07 C 7212
)	
v.)	Judge Lefkow
)	
P.O. A. CRISCIONE, Star #16195,)	Magistrate Judge Cole
P.O. S. MULKERRIN, Star #17071,)	
ANTHONY CAPUTO, individually, and THE)	
CITY OF CHICAGO, ILLINOIS SOLUTION)	
GROUP, and BILL KAY CHRYSLER)	
)	
Defendants.)	JURY DEMANDED

**PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT BY DEFAULT
AGAINST DEFENDANT ILLINOIS SOLUTION GROUP**

NOW COME the Plaintiff, George Gatlin, by and through their attorneys of record, Ed Fox & Associates, and respectfully move this Court to enter a judgment by default against Defendant Illinois Solution Group. In support of this motion, Plaintiffs state as follows:

1. This is a Section 1983 case with two state supplemental claims alleged against Defendant Illinois Solutions Group: Count V for False Arrest and Count VII for Malicious Prosecution. Illinois Solutions Group is alleged to be liable for the acts of Defendant Caputo pursuant to the doctrine of *respondeat superior*.
2. Plaintiff filed his First Amended Complaint adding Illinois Solution Group as a defendant on April 29, 2008, which is attached hereto as Exhibit A.
3. Plaintiffs mailed Defendant Illinois Solution Group a request for waiver of service of summons on April 30, 2008. Defendant did not claim the waiver, which were sent via certified mail.

4. Plaintiff then proceeded with service under Rule 4 and served Defendant Illinois Solution Group with Summons on May 30, 2008, which is attached hereto as Exhibit B.

7. Defendant Illinois Solution Group has not answered the Complaint and/or otherwise pled. It has been over 20 days since Defendant Illinois Solution Group was served with summons.

8. Therefore, pursuant to Federal Rule of Civil Procedure 55, Plaintiffs move this Court to enter a judgment by default against Defendant Illinois Solution Group.

WHEREFORE, the Plaintiff, GEORGE GATLIN, by and through his attorneys of record, Ed Fox & Associates, respectfully move this Court to enter a judgment by default against Defendant Illinois Solution Group.

Respectfully submitted,

/s/ Leslie C. McCoy
Leslie C. McCoy
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